

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**
Case No. 1:23-md-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

This Document Relates To:

Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.
Case No. 1:23-cv-22960 (S.D. Fla.)

Cabo, et al. v. Temasek Holdings (Private) Limited, et al.
No. 1:23-cv-03974 (N.D. Cal.)

**UNOPPOSED MOTION TO EXTEND REPLY BRIEFING DEADLINE
FOR SINO GLOBAL CAPITAL LIMITED'S
THREE MOTIONS TO DISMISS**

Defendant Sino Global Capital Limited (“SG Capital Limited”) respectfully submits this unopposed motion seeking an order from this Court extending by one week the deadline for its three reply briefs in support of its Motion to Dismiss for Insufficient Service of Process (ECF No. 497), its Motion to Dismiss for Lack of Jurisdiction (ECF No. 498), and its Motion to Dismiss for Failure to State a Claim (ECF No. 499) (collectively, “Motions to Dismiss”). SG Capital Limited has conferred with counsel for Plaintiffs, who have indicated that they do not oppose SG Capital Limited’s request to extend its reply brief deadlines for each of the three Motions to Dismiss from March 27, 2024 to April 3, 2024.

1. On February 16, 2024, Plaintiffs filed a Motion for Leave to File Amended Complaint Against Multinational VC Defendants (ECF No. 493) (“Motion for Leave to Amend”).

2. On February 21, 2024, SG Capital Limited filed its three Motions to Dismiss (ECF Nos. 497, 498, 499).

3. Plaintiffs and Multinational VC Defendants, including SG Capital Limited, conferred regarding a briefing schedule covering both Plaintiffs’ Motion for Leave to Amend and SG Capital Limited’s Motions to Dismiss. The parties reached an agreement whereby the parties’ opposition deadlines related to Plaintiffs’ Motion for Leave to Amend and SG Capital Limited’s Motions to Dismiss would be extended by fourteen days to March 15, 2024 and March 20, 2024 respectively. During those discussions, Plaintiffs and Multinational VC Defendants further agreed to grant the other a one-week extension of their respective reply deadlines in support of the Motion for Leave to Amend and SG Capital Limited’s Motions to Dismiss should the parties desire to file a reply brief.

4. The parties filed a joint motion seeking an order from this Court approving the extension of the opposition deadlines related to Plaintiffs’ Motion for Leave to Amend and SG

Capital Limited's Motions to Dismiss (ECF No. 508). This Court granted that motion on March 5, 2024 (ECF No. 514). The motion and order did not address the parties' reply brief deadlines.

5. SG Capital Limited now seeks an order from this Court extending the March 27, 2024 deadline for its reply briefs in support of each of its Motions to Dismiss by one week in accordance with the parties' agreement, making such replies due on or before April 3, 2024. Plaintiffs have agreed to this requested relief.

WHEREFORE, SG Capital Limited prays that the Court grant its Unopposed Motion to Extend Reply Briefing Deadline on SG Capital Limited's Motions to Dismiss and extend such deadline to April 3, 2024.

Dated: March 21, 2024

/s/ Jason P. Gottlieb

Jason P. Gottlieb

Michael Mix

Vani Upadhyaya

MORRISON COHEN LLP

909 Third Avenue

New York, New York 10022

Telephone: (212) 735-8600

Email: jgottlieb@morrisoncohen.com

mmix@morrisoncohen.com

vupadhyaya@morrisoncohen.com

*Counsel for Defendant Sino Global Capital
Limited*

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1, counsel for SG Capital Limited conferred with counsel for Plaintiffs regarding whether they would oppose the relief requested herein. Counsel for Plaintiffs indicated that they did not oppose the extension requested herein.

Dated: March 21, 2024

/s/ Jason P. Gottlieb

Jason P. Gottlieb

Michael Mix

Vani Upadhyaya

MORRISON COHEN LLP

909 Third Avenue

New York, New York 10022

Telephone: (212) 735-8600

Email: jgottlieb@morrisoncohen.com

mmix@morrisoncohen.com

vupadhyaya@morrisoncohen.com

*Counsel for Defendant Sino Global Capital
Limited*

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2024, I e-filed a true and correct copy of the foregoing document using the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Jason P. Gottlieb
Jason P. Gottlieb